Schary, Claire

From: Marti.Bridges@deq.idaho.gov
Sent: Tuesday, July 15, 2014 8:47 AM

To: cochran@willamettepartnership.org; Schary, Claire; nmullane@msn.com

Subject: Idaho trading pilot

Claire; Bobby and I met while you were globe-trotting through Germany, Eastern Europe and Ireland to discuss Idaho's pilot. Despite my efforts to get Susan Poulsom to help work on a mock permit, nothing has come of that. I feel certain this is because she is over-tapped with the enormous backlog of NPDES permits in Idaho and oversight of the D.C. Headquarters folks who are also helping with those.

That said, Robbin Finch in his typical manner, has pushed and pushed on DEQ, TFT and WP about updating the trading guidance and framework for the Lower Boise. Both Barry Burnell, Michael McIntyre and I have made it clear we are not going to tackle a total revamp until the Lower Boise TMDL WLAs are done and have buy in by the WAG and EPA. That won't likely happen before December at the earliest.

However, there are a number of things that Bobby and I have identified that could be done that relate to adopting attributes of the JRA recommendations as a "pilot". In other words, we'd get the ball rolling on refreshing things like preapproved BMPS, actionable items like trade verification language, registry language, establishing a baseline, etc. I'm sure there are more items I'm forgetting at the moment.

Alex Johnson from TFT is working on a contract with some of the cities, purportedly, to identify an economic analysis of likely trading locales and viability and kinds of projects. I think his focus is on TP and might also include temperature, but not sure on that. I know that either Nampa or Meridian approved money to contract with him. The work he does could ultimately become and appendix of the trading framework.

That said, I have travel money and believe the four of us should consider a face to face and work session for a day or two if need be to look at what we have in place, what we can update in the next 4 to 5 months prior to the TMDL and what we can work on before engaging a select group of stakeholders to weigh in. I don't want to manage a group of 42 like Ross and Associates did. But I do want to make sure a select group are chosen for an initial review and then assemble a larger group to present our work to.

What are some time frames you would have happen between now and mid-August? We could meet in Portland or Seattle. Whatever works best for Claire, as I would fly to either one. I know EPA doesn't have a lot of money. If it was Portland and Claire doesn't mind my snoring, she could room with me, too. Just a thought.

Give me some feedback on this idea and if you're all in—and Claire, you are key to this, I can always do a doodle poll. But if you all know you have some openings for a couple days or more here and there, let me know.

And Bobby, if you can weigh in on our discussion and elaborate on things I've missed, I thank you. The fog of post Salmon River trip letdown is still in my brain.

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